

# **EXHIBIT 30**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC.

Plaintiff,

vs.

STOCKX LLC,

Defendants.

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) No.

) 1:22-cv-00983-VEC

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The videotaped deposition of

KARI KAMMEL

taken before JO ANN LOSOYA, CSR, RPR, CRR, pursuant  
to the provisions to the taking of depositions at  
444 West Lake Street, Chicago, Illinois commencing  
at 9:45 a.m. on July 18, 2023.

1       **PRESENT:**

2  
3               DLA PIPER LLP  
4               TAMAR DUVDEVANI  
5               MARC MILLER  
6               1251 Avenue of the Americas  
7               New York, New York 10020  
8               tamar.duvdevani@dlapiper.com  
9               marc.miller@dlapiper.com  
10              Appeared on behalf of Plaintiff.

11              DEBEVOISE & PLIMPTON LLP  
12              MEGAN K. BANNIGAN  
13              KATHRYN SABA  
14              919 Third Avenue  
15              New York, New York 10022  
16              mkbannigan@debevoise.com  
17              ksaba@debevoise.com  
18              Appeared on behalf of Defendants.

19       **ALSO PRESENT:**

20              KIM VAN VOORHIS,  
21              Nike, Inc.

22       **VIDEOGRAPHER:** Milo Savich  
23       **STENOGRAPHICALLY REPORTED BY:**  
24       JO ANN LOSOYA, CSR, RPR, CRR  
25       **LICENSE #:** 084-002437

1 looking through that, and again, none of those are  
2 actually authentication, because the brand is the  
3 only one that can authenticate a product that is  
4 produced by them.

5 Q. Generally speaking, if counterfeiters  
6 inundate platforms and some counterfeits still get  
7 through the platform, does that necessarily mean  
8 that the platform's anti-counterfeiting measures are  
9 not beneficial in any way?

10 A. So I don't know if I can speak to that  
11 general statement.

12 Again, it would depend on the  
13 platform, it would depend on what they're selling,  
14 it would depend on, you know, what efforts they've  
15 decided to pursue in response to  
16 anti-counterfeiting. A lot of -- a lot of factors  
17 in there that would have to be considered.

18 Q. So you can't say that stopping some  
19 counterfeits is beneficial, correct?

20 A. No. I don't believe that's what I said.

21 Q. Let me ask you then. Can you say -- is  
22 stopping counterfeits, regardless of the amount you  
23 stop, beneficial?

24 MS. DUVDEVANI: Objection.

25

1 BY THE WITNESS:

2 A. So my entire life's work is around right  
3 now anti-counterfeiting. So if there's any -- if  
4 there's any opportunity for someone to remove a  
5 potential counterfeit good from the stream of  
6 commerce, whether that's someone enforcing on Canal  
7 Street, or a brand owner submitting for a notice and  
8 take down or a law enforcement agent following up,  
9 yes, the goal of all of brand protection and  
10 anti-counterfeiting is to remove counterfeit --  
11 counterfeit listings or counterfeit products,  
12 depending on whether it's brick and mortar or any  
13 e-commerce.

14 Q. If a platform's anti-counterfeiting  
15 measures still inadvertently allow some counterfeits  
16 through, does that necessarily mean that the  
17 platform is not trying to prevent the sale of  
18 counterfeits?

19 MS. DUVDEVANI: Objection.

20 BY THE WITNESS:

21 A. Again, I can't speak to whether a  
22 platform is trying or not.

23 Q. You can't speak to whether the platform  
24 is not trying or not?

25 A. Correct.

1 Q. Would you agree that no  
2 anti-counterfeiting program is perfect?

3 A. Specifically what do you mean by perfect?

4 Q. Would you agree that no  
5 anti-counterfeiting program is able to eliminate the  
6 threat of counterfeits?

7 A. Correct. So no -- I would agree with  
8 that that no anti-counterfeiting program is able  
9 to -- and if you are talking in the context of  
10 platforms, is able to entirely -- entirely eliminate  
11 counterfeiting, which is why e-commerce platforms  
12 that allow third party sellers are so risky because  
13 of that and also why it was surprising for me that  
14 StockX had claimed to essentially make sure almost  
15 100 percent of their products were authentic and  
16 they essentially eliminated counterfeiting in their  
17 marketplace.

18 Q. Do you know of any platforms that aren't  
19 inundated with counterfeits?

20 MS. DUVDEVANI: Objection.

21 BY THE WITNESS:

22 A. Again, I haven't spoken to other  
23 platforms specifically on levels of inundation by  
24 similar sellers. We know that counterfeiting is  
25 increasing exponentially, particularly since the